

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
	)	
v.	)	No. 07 CR 851
	)	Judge Robert W. Gettleman
FRANCISCO MENDEZ-NUNEZ, <i>et al.</i> ,	)	
(FRANCISCO SOTO)	)	
	)	
Defendant.	)	

**DEFENDANT SOTO'S MOTION FOR AN EXTENSION  
OF TIME WITHIN WHICH TO FILE ADDITIONAL PRETRIAL MOTIONS**

Defendant, **FRANCISCO SOTO**, by and through his attorney, **PATRICK W.**

**BLEGEN**, pursuant to Rules 12 and 16 of the Federal Rules of Criminal Procedure, as well as the Due Process and Effective Assistance of Counsel Clauses of the Fifth and Sixth Amendments to the Constitution of the United States, respectfully moves this Court for an extension of time within which to file additional pretrial motions.

In support of this motion, Defendant, through counsel, shows to the Court the following:

1. On March 18, 2008, Defendant was charged in two counts of a nine count indictment with: one count of conspiracy to possess with intent to distribute and to distribute five kilograms or more of cocaine, pursuant to 21 U.S.C. §846 (Count One); and, one count of possession with intent to distribute cocaine, pursuant to 21 U.S.C. §841(a)(1).
2. Defendant has filed simultaneously herewith several standard pretrial motions.
3. Pursuant to pretrial discovery, the government has tendered several hundred pages of discovery, as well as multiple CDs/DVDs containing wiretap recordings.
4. Counsel submits that an extension of time is necessary so that counsel can

complete his review of discovery, and file substantive pretrial motions, if appropriate.

WHEREFORE, Defendant requests an extension of time within which to file additional pretrial motions after a more thorough review of the discovery tendered to date.

Respectfully submitted,

**s/Patrick W. Blegen**

**PATRICK W. BLEGEN**, Attorney for  
Defendant, Francisco Soto.

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**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing Defendant Soto's Motion for an Extension of Time Within Which to File Additional Pretrial Motions was served on April 14, 2008, in accordance with Fed.R.Crim.P.49, Fed.R.Civ.P.5, LR 5.5, and the General Order on Electronic Case Filing (ECF) pursuant to the district court's system as to ECF filers.

**s/ Patrick W. Blegen**\_\_\_\_\_

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